



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VIII

935 14th STREET - SUITE 500

DENVER, COLORADO 80202-2406

EPR-F

SEP 4 1998

Ms. Regina R. Sarter
 RFCA Project Coordinator
 Department of Energy
 Rocky Flats Field Office
 P.O. Box 28
 Golden, CO 80402-0928

OPTIONAL FORM 35 (7-90)

FAX TRANSMITTAL

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To <i>Los Legros</i>	From <i>Tim Rehder</i>
Page Agency	Phone # <i>312-6293</i>
Fax # <i>916-2995</i>	Fax # <i>312-6897</i>

NEN 7540-01-317-7368

5010-104

GENERAL SERVICES ADMINISTRATION

RE: IDM as backfill for the T-1 Trench

Dear Ms. Sarter:

This letter is written to outline EPA concerns relating to the management and potential disposition of investigatively derived materials (IDM) presently being stored at Rocky Flats. A presentation was made by you and your consultants on September 1, 1998, regarding a proposal to use IDM as backfill for the T-1 Trench at Rocky Flats. Below is a summary of our understanding of the proposal followed by a list of concerns and recommendations to address these items.

SUMMARY:

It is our understanding that any soils from T-1 that were found to contain radionuclides between 5000 and 10,000 cpm will be shipped off-site for disposal. A total of 3,535 drums of IDM discussed at the meeting. An additional 531 drums have been repacked for shipment to the Nevada Test Site. Of that, 444 drums have already been sent to the Erie Landfill. Of the remaining 2,560 drums, you have analyses of 428 drums for 5 isotopes (Attachment 1) and analysis from 461 drums for up to 4 isotopes.

CONCERNS AND RECOMMENDATIONS:

You stated that you are not certain whether the analyses cited above was performed via gamma or alpha spectroscopy. This is a concern given the document quality problems associated with the on-site gamma spectroscopy program. Please verify which type of analysis was performed.

At the time of IDM generation, an agreement was made between EPA and DOE that the IDM would be tracked by that location so that IDM generated in clean areas of the site would be considered uncontaminated, eliminating the need for further analysis of the IDM drums. It was not clear to us at the meeting whether the Site has the ability to match IDM with their location of origin.

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B2-1108-A-00075

There are 1670 drums which were analyzed, however, the data has yet to be obtained/reviewed as it is being stored at an alternate location. If characterization data for these drums cannot be obtained and they cannot be correlated to specific sampling locations, some amount of additional analysis will be necessary before the material is used as backfill.

Finally, we are concerned that an attempt to dispose of the total inventory of IDM at T-1 may result in a rather large mound that could conflict with final grading/drainage plans for the site. Please provide the proposed backfill volume estimates and final grading plans for backfill at T-1 as they become available.

We look forward to further discussions on this topic. You may contact Jean Lillich at 312-6258 if you have any questions concerning this correspondence.

Sincerely,

08/09/98 WED 09:49 FAX


Tim Rehder
Rocky Flats Team Leader

cc: Steve Gunderson, CDPHE
Carl Spreng, CDPHE
Lane Butler, Kaiser-Hill



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